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46 MUFG Union Bank, N.A.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

CHRISTINA NELSON, an individual,

Plaintiff,

V.

GENUENT USA, LLC, a New Hampshire corporation; MUFG UNION BANK, N.A., a California national association; and DOES 1 through 10, inclusive,

Defendants.

Case No. 3:18-cv-05930

ASSIGNED TO HON. JON S. TIGAR

**JOINT STIPULATION AND
[PROPOSED] ORDER TO
TRANSFER VENUE**

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IT IS HEREBY STIPULATED by and CHRISTINA NELSON (“Plaintiff”), Defendant GENUENT USA, LLC (“Genuent”), and Defendant MUFG UNION BANK, N.A. (“Union Bank”) (collectively, “the Parties”), by and through their attorneys of record:

WHEREAS, the Complaint (“Complaint”) in this matter was filed on August 27, 2018 in Superior Court of the State of California, County of San Francisco;.

WHEREAS, on September 27, 2018, Defendants Genuent and Union Bank removed the action to the Northern District of California;

WHEREAS, the Parties have met and conferred concerning the venue of this action:

WHEREAS, Plaintiff reported remotely to Genuent's Orange County office;

WHEREAS, the worksite from which assignments were made was Genuent's Orange County office;

WHEREAS, the Genuent employee who terminated Plaintiff works out of Genuent's Orange County office;

WHEREAS, the documents pertinent to this lawsuit within California are kept at Genuent's Orange County office and/or Union Bank's Monterey Park office;

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1 WHEREAS, the witnesses Defendants intend to utilize in this lawsuit are
2 located in Genuent's Orange County office and/or Union Bank's Monterey Park
3 office;

4 WHEREAS, the Parties agree that, pursuant to 28 U.S.C. § 1404(a), this action
5 should be transferred to the United States District Court for the Central District of
6 California, Southern Division for the convenience of the parties and witnesses, as all
7 or most of Plaintiff's causes of action are based on conduct which allegedly occurred
8 in that District and Defendant's witnesses with knowledge of such alleged conduct
9 are located in that District;

10 THEREFORE IT IS HEREBY STIPULATED AND AGREED:

11 1. This action shall be transferred from the Northern District of California to the
12 United States District Court for the Central District of California, Southern Division.

13 || Dated: October 23, 2018

JANA M. MOSER
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Attorneys for Plaintiff
CHRISTINA NELSON
GENUENT USA, LLC.

Dated: October 23, 2018

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1 Dated: October 23, 2018

2 *Ronald D. Arena by permission*

3 RONALD D. ARENA,
4 SATIA FAMILI
5 ARENA HOFFMAN LLP

6 Attorneys For Defendant
7 MUFG UNION BANK, N.A.

8 [PROPOSED] ORDER

9
10 Upon consideration of the parties' Joint Stipulation to Transfer Venue, and
11 good cause appearing therefore, IT IS HEREBY ORDERED that this action be
12 transferred to the United States District Court for the Central District of California,
13 Southern Division.

14 IT IS SO ORDERED.

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17 Dated: October 29, 2018

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19 Judge JON S. TIGAR
20 United States District Court,
21 Northern District of California

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